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UNITED STATES DISTRICT COURT
FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States District Court
Southern District of Texas
FILED

JUN 07 2010

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA
Plaintiff,

v.

\$19,629.00 IN U.S. CURRENCY
Defendant

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§

CIVIL ACTION NO. 4:10-CV-01218

VERIFIED CLAIM OF CLAIMANT

Pursuant to Supplemental Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions (the “Supplemental Rules”), Jorfui Dolly Kandeh asserts her interest and right in \$19,629.00 in United States currency currently seized under the Government’s verified complaint. In support of Claimant’s verified statement, Claimant asserts that;

1. Claimant was the legal owner and/or bailee of the funds that was seized by Customs and Border Protection officer(s) on March 18, 2010 at George Bush Intercontinental Airport in Houston, Texas.

2. Claimant was carrying several envelopes, given to her by various people, for Claimant to give to the families of these people once Claimant was in her native country. See statement from Claimant attached as Exhibit “A”.

3. These people include, Dende Dorcas Korpoi, Fatoumata Camara, Abdul Pewa, Gladys Mason, Edwin Macfoy, Fatmata Koroma, and Maima Gilyard. See affidavits and bank statements from the hereinabove named individuals attached as Exhibit “B”.

1 4. Claimant was the bailee of the funds seized by Customs and Border Protection;

2 a. \$5,000.00 held in an envelope with the name Fatoumata Camara written on the

3 envelope;

4 b. \$200.00 held in an envelope with the name Gladys Mason written on the

5 envelope;

6 c. \$1,000.00 held in an envelope with the name Fatmata Koroma written on the

7 envelope;

8 d. \$2,000.00 held in an envelope with the name Abdul Pewa written on the

9 envelope;

10 e. \$1,000.00 held in an envelope with the name Maima Gilyard written on the

11 envelope;

12 f. \$2,000.00 held in an envelope with the name Edwin Macfoy written on the

13 envelope;

14 g. 1,500.00 held in an envelope with the name Dende Dorcas Korpoi written on

15 the envelope.

17 5. The Government named Jorfui Dolly Kandeh, Dende Dorcas Korpoi, Fatoumata
18 Camara, Abdul Pewa, Gladys Mason, Edwin Macfoy, Fatmata Koroma, and Maima Gilyard's
19 funds and/or property as defendants in its verified complaint and that property remains subject to
20 seizure pending the resolution of forfeiture proceedings. As mentioned above, Claimant was
21 carrying these funds for the benefit of the families for the named individuals. These funds were
22 separate and placed in their own envelope with the name of the individual written on the
23 envelope. Claimant was the person in possession of these funds and exercised dominion and
24 control over the above listed funds. Therefore, because Claimant exercised dominion and
25

1 control over these funds and is listed in the complaint, Claimant asserts her right to defend this
2 forfeiture action.

3 6. Claimant timely files this claim under 18 U.S.C. § 983(a)(4)(A).

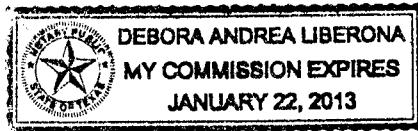
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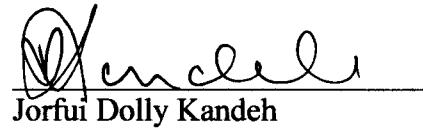
5 **VERIFICATION**

6 I hereby declare under the penalty of perjury that the foregoing is true and correct.

7 Executed on June 7, 2010

8 **SWORN AND SUBSCRIBED**
9 **BEFORE ME ON JUN - 7 2010**



14 
Jorfuli Dolly Kandeh

15 Respectfully submitted,

16 **PORTZ & PORTZ**

17 
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19 SBN: 24053417
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21 Houston, Texas 77002
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23 Fax.: (713)223-1901
24

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was served via hand delivery and/or certified mail return receipt requested to the Assistant United States Attorney on June 7, 2010.

Craig Pena